

**Federal Defenders
OF NEW YORK, INC.**

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

July 9, 2020

BY ECF

Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

**Re: United States v. Garrett Kelsey
19 Cr. 886 (SHS)**

Dear Judge Stein:

I write seeking a modest modification of Garrett Kelsey's bail conditions to permit him to leave his father's home on specific, pre-approved dates and times to obtain a new apartment.

On December 20, 2019, the Court modified Mr. Kelsey's bail conditions and forbade him from leaving his father's home except to work and to attend legal and doctor visits. See Minute Entry at ECF No. 21. Mr. Kelsey was also ordered not to relocate from his father's home without the Court's authorization. Id.

Since then, Mr. Kelsey has been working and saving money. He is now in a position to get his own apartment and is eager to do so. I have consulted with pre-trial services and counsel for the government, and both consent to a modification of Mr. Kelsey's conditions that will allow him to leave home on discrete, pre-approved dates and times to seek new housing. Specifically, the parties agree that before Mr. Kelsey be permitted to leave his father's home for apartment hunting-related purposes, he must make an appointment ahead of time and communicate all details of such appointments to his pre-trial officer in the Northern District of Iowa, including the time, date, location, and anticipated duration of the meetings. Once Mr. Kelsey has found suitable housing, the defense will submit another letter motion requesting that Mr. Kelsey be permitted to relocate from his father's house.


Respectfully Submitted,

_____/s/
Andrew J. Dalack
Assistant Federal Defender
(212) 417-8768

Application granted.

Cc (by ECF): AUSA Stephanie L. Lake

**Dated: New York, New York
July 9, 2020**

SO ORDERED

SIDNEY H. STEIN
U.S.D.J.